

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ELIZABETH ALICEA, MICHELLE URRUTIA,)
KATINA RAMOS, and JACK ARTINIAN,)
Individually and on behalf of all)
others similarly situated,)

Plaintiffs,)

-vs-

18 CV 05381

COUNTY OF COOK, and THOMAS J. DART,)
in his official capacity as)
Sheriff of Cook County,)

Defendants.)

The discovery deposition of Rule 30(b)(6)
Witness DONALD MILAZZO, taken pursuant to the provisions
of the Code of Civil Procedure and the Supreme Court
Rules of the State of Illinois pertaining to the taking
of depositions for the purpose of discovery, taken before
DEANNA L. TUFANO, Certified Shorthand Reporter of the
State of Illinois, at 77 West Washington Street, Suite
1220, on March 13, 2019, at 5:04 p.m.

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<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 ZIMMERMAN LAW OFFICES, P.C. 3 MR. THOMAS A ZIMMERMAN, JR. 4 MR. NICKOLAS J. HAGMAN 5 77 West Washington Street, Suite 1220 6 Chicago, IL 60602 7 (312) 440-0020 8 tom@attorneyzim.com 9 on behalf of Plaintiffs; 10 11 REITER BURNS, LLP 12 MS. ELIZABETH A. EKL 13 MR. DANIEL BURNS 14 311 S. Wacker Drive, Suite 5200 15 Chicago, IL 60606 16 (312) 878-1297 17 Eekl@reiterburns.com 18 on behalf of Defendants. 19 20 MS. KHARA COLEMAN 21 LEGAL DEPARTMENT COOK COUNTY SHERIFF'S OFFICE 22 50 West Washington Street, Room 704 23 Chicago, IL 60602 24 (312) 603-5473 khara.coleman@cookcountyil.gov REPORTED BY: DEANNA L. TUFANO, CSR LICENSE NO. 084-003819</p>	<p style="text-align: right;">Page 3</p> <p>1 INDEX 2 3 WITNESS PAGE 4 DONALD MILAZZO 5 Examination by Mr. Zimmerman 4 6 Examination by Ms. Ekl 62 7 EXHIBITS 8 MARKED 9 NUMBER 10 Exhibit No. 6 8 11 Previously marked Exhibit Nos. 1, 2, and 4 were referred 12 to. 13 14 15 16 17 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 4</p> <p>1 (Witness sworn.) 2 DONALD MILAZZO, 3 called as a witness herein on behalf of the Plaintiff, 4 having been first duly sworn, was examined and testified 5 as follows: 6 EXAMINATION 7 BY MR. ZIMMERMAN: 8 Q Would you please state your name and spell it for 9 the record. 10 A Sure. It's Donald Milazzo, M-I-L-A-Z-Z-O. 11 Q All right. This is the deposition of Donald 12 Milazzo taken pursuant to notice set to today's date by 13 agreement of the parties. 14 You're a lieutenant? 15 A Yes. 16 Q Can I call you Lieutenant Milazzo? 17 A Sure. 18 Q Okay. Thank you. 19 Have you ever given a deposition before? 20 A Yes. 21 Q All right. If I ask a question you don't 22 understand or didn't hear, please let me know I'll be 23 happy to rephrase it. I want to get through this as 24 quickly as we can. If you answer a question, I'll assume</p>	<p style="text-align: right;">Page 5</p> <p>1 you heard and understood; is fair enough? 2 A Yes. 3 Q Where are you currently employed? 4 A Cook County Sheriff's Office. 5 Q And is there a particular area that you work? 6 A Bridgeview Courthouse. 7 Q And what is your position there? 8 A Lieutenant. 9 Q And so what generally are the job duties for 10 that? 11 A There is no superintendent in my building, so I 12 do the superintendent's job and the lieutenant's job. I 13 am responsible for the entire building and all of the 14 people who work there. 15 Q All right. And how long have you been a 16 lieutenant? 17 A Let's see, 23 years. 18 Q Oh, wow. All right. So I don't care what you 19 did before that. 20 So if you can look, please, at Exhibit No. 1 for 21 me. 22 A Okay. 23 Q All right. So this is the Rule 30(b)(6) notice 24 of deposition, and you have been designated by the</p>

<p style="text-align: right;">Page 6</p> <p>1 Defendant's, County of Cook and Sheriff Tom Dart as the 2 representative to testify as to their knowledge on 3 certain topics, topics one through five. And so I am 4 asking you, are you being produced here today as the Rule 5 30(b)(6) witness to testify as to topics 1 through five 6 as it pertains to the Bridgeview Courthouse? 7 A Yes. 8 Q What did you do then to prepare for the 9 deposition, you know, to gather the knowledge of the 10 defendants? 11 A I met with the attorney yesterday. 12 Q All right. Did you do any search for any 13 documents? 14 A Yes. 15 Q And what did you search for? 16 A We were requested to submit work orders, 17 inspection sheets. I don't recall. 18 Q And other than meeting with your attorneys, did 19 you talk to anybody else within the sheriff's department 20 to try to gather some of the information that would be 21 responsive to any of the topics one through five? 22 A As far as asking somebody to collect them? 23 Q Or like talking to them and saying, hey, I don't 24 none the answer, do you know the answer?</p>	<p style="text-align: right;">Page 7</p> <p>1 A No. 2 Q So the knowledge that you have obtained, is that 3 from your review of documents? 4 A Yes. 5 MS. EKL: I'm just going to object to the vagueness 6 of that objection. Sorry for the belated objection. 7 BY MR. ZIMMERMAN: 8 Q The knowledge that you have obtained relative to 9 the topics in the dep notice topics one through five, 10 does that come from your review of documents? 11 A The documents we submitted, yes. 12 MS. EKL: And you're saying outside of his personal 13 knowledge as lieutenant acting as superintendent at 14 Bridgeview Courthouse? 15 MR. ZIMMERMAN: Well, that's a good point. 16 BY MR. ZIMMERMAN: 17 Q So you would also have personal knowledge 18 yourself of some of the information that's requested in 19 topics one through five? 20 A Yes. 21 Q All right. And when you did your search for 22 documents? How did you go about it? 23 A As far as the -- most of them I just -- I have an 24 administer assistant, and I just had her collect them.</p>
<p style="text-align: right;">Page 8</p> <p>1 Q And what were the specific search terms or 2 parameters that were used? 3 A Well, we were looking for monthly building 4 inspection reports, work orders. 5 Q Okay. Are those kept in like a central location? 6 A Yes. 7 Q And where is that at? 8 A Most of the time once they send them to the chief 9 of court's office, my administrative assistant keeps them 10 in an electric file. 11 Q Scans them in or something? 12 A Yes. 13 Q And is that true for the work orders to or just 14 for the inspection reports? 15 A The work orders, there's another whole website 16 that we can go into and just pull up whatever work orders 17 we put in. 18 Q Did you search that or is that somebody else -- 19 A That was my administrative assistant. 20 MR. ZIMMERMAN: What are we be on, Exhibit No. 6? 21 THE COURT REPORTER: Yes. 22 (Exhibit No. 6 was marked 23 as requested.) 24 BY MR. ZIMMERMAN:</p>	<p style="text-align: right;">Page 9</p> <p>1 Q All right. So You've seen the drill. 2 A I have. 3 Q If there is something that can make this go by 4 quicker, I'd love to know it. So these photos, is there 5 a way to group them in any way to help us get through 6 this faster, or do we have to go through them one by one? 7 A The first ones are all from the juvenile area. 8 We do not even use it. 9 Q All right. Let's go through those then. 10 They're labeled Juvenile Interview Room Number 11 1, Number 2, and exit from Juvenile Holding, can I group 12 those together? 13 A Yes. 14 Q And what does the photo in Juvenile Room 1 show? 15 A At one time they would have used that for lawyers 16 to speak to the juvenile clients. 17 Q Is that photo the lawyer's side or the juvenile's 18 side? 19 A That would be the juvenile's side. 20 Q And now is it a storage room? 21 A Yes. 22 Q The next one Juvenile Interview Room Number 2, is 23 that the lawyer side of the interview room? 24 A Yes.</p>

<p style="text-align: right;">Page 10</p> <p>1 Q And now that's a storage room?</p> <p>2 A Yes.</p> <p>3 Q And then the next one Exit from Juvenile Holding,</p> <p>4 what is that showing?</p> <p>5 A That shows the door leading out to the juvenile</p> <p>6 courtroom.</p> <p>7 Q Is there just one courtroom for juveniles?</p> <p>8 A Yes.</p> <p>9 Q And what room is this that it's shown on this</p> <p>10 photo? Is that a juvenile holding cell?</p> <p>11 A It's just a hallway that they would have moved</p> <p>12 them from juvenile lockup into the actual courtroom.</p> <p>13 It's not used.</p> <p>14 Q Not used. All right.</p> <p>15 And then the next photo is Detention Number 21,</p> <p>16 what is shown in that photo?</p> <p>17 A I believe that's one of the juvenile lockups.</p> <p>18 Q That would be a holding cell?</p> <p>19 A A holding cell yes.</p> <p>20 Q Where juveniles would be placed?</p> <p>21 A Would be if we were using it, yes.</p> <p>22 Q And that's not used?</p> <p>23 A No.</p> <p>24 Q When did that stop being used?</p>	<p style="text-align: right;">Page 11</p> <p>1 A I've been there since January of '18. It wasn't</p> <p>2 used any time I was there.</p> <p>3 Q Oh, well, you raise a good point.</p> <p>4 So how long have you been at the Bridgeview</p> <p>5 Courthouse?</p> <p>6 A Since January of 2018.</p> <p>7 Q And prior to that, where were you at?</p> <p>8 A Maywood.</p> <p>9 Q From when to when?</p> <p>10 A For 2017, I would have been at Maywood.</p> <p>11 Q For '17 until January of '18. And prior to that,</p> <p>12 where were you?</p> <p>13 A I was in Markham.</p> <p>14 Q And how long were you there?</p> <p>15 A Approximately a year.</p> <p>16 Q Another year. And prior to that, where were you?</p> <p>17 A I think it was Rolling Meadows.</p> <p>18 Q And how long were you there?</p> <p>19 A It's hard to recall. At one point, I was at</p> <p>20 Rolling Meadows and I was also running Rolling Meadows</p> <p>21 and Skokie, and then I was at Juvenile. It's hard to</p> <p>22 remember. Say six months to a year there.</p> <p>23 Q That's good enough.</p> <p>24 A Okay. I have a hard time remembering.</p>
<p style="text-align: right;">Page 12</p> <p>1 Q So since January of 18th, this Juvenile Detention</p> <p>2 Number 21 cell has not been used?</p> <p>3 A Right.</p> <p>4 Q Then the next one says Corridor, and that's CAM</p> <p>5 0.026, and what is that showing?</p> <p>6 A That would have been another lockup area for the</p> <p>7 juvenile section.</p> <p>8 Q Is that used?</p> <p>9 A No.</p> <p>10 Q Is that also not been used since January of 2018?</p> <p>11 A Yes.</p> <p>12 Q Next photo, Basement Corridor, what is that</p> <p>13 showing?</p> <p>14 A I believe that's the same corridor only from the</p> <p>15 opposite direction.</p> <p>16 Q All right. So that's not used?</p> <p>17 A Right.</p> <p>18 Q The next is Entrance to Juvenile Holding, and</p> <p>19 what is that showing?</p> <p>20 A I believe that's a door that goes out into the</p> <p>21 hallway leading to the main lockup.</p> <p>22 Q For juveniles?</p> <p>23 A Yes.</p> <p>24 Q Is that door used?</p>	<p style="text-align: right;">Page 13</p> <p>1 A If it is, it's used as a pass-through.</p> <p>2 Q Are there any holding cells that are operational</p> <p>3 for juveniles?</p> <p>4 A Generally we get the juveniles into court and out</p> <p>5 of court as soon as we possibly can, and then we get them</p> <p>6 back on the bus with the juveniles. We don't like to</p> <p>7 keep them in the building. We don't get that many and we</p> <p>8 only get them on Fridays. So we might get one or two, we</p> <p>9 get them in and we get them out right away.</p> <p>10 Q So there's no designated area for them to --</p> <p>11 A No.</p> <p>12 Q All right. Then we have General Area D72A, what</p> <p>13 is that showing?</p> <p>14 A I believe that's another one in the juvenile</p> <p>15 lockup side, and it's used for storage.</p> <p>16 Q And the next one is Detention Number 4. What is</p> <p>17 that showing?</p> <p>18 A That's in the main male lockup area.</p> <p>19 Q Male?</p> <p>20 A Male.</p> <p>21 Q Is that in use?</p> <p>22 A Not at the time this picture was taken.</p> <p>23 Q Because of the cracks?</p> <p>24 A Yes. It's more of a spill over or if we need to</p>

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<p>1 separate somebody.</p> <p>2 Q All right. So it's in use but for a period of</p> <p>3 time, it was out of use so they can fix the glass on the</p> <p>4 door?</p> <p>5 A Yes.</p> <p>6 Q And so male detainees would be held in here?</p> <p>7 A Yes.</p> <p>8 Q And then there's a toilet on the right side; is</p> <p>9 that right?</p> <p>10 A Yes.</p> <p>11 Q All right. What about Detention D26, what is</p> <p>12 that showing?</p> <p>13 A That would be just showing into like the main</p> <p>14 area. The male lockup is shaped sort of like an H, so</p> <p>15 this would have been on the right-hand side of the H</p> <p>16 toward the left. So it would be showing more of the male</p> <p>17 lockup cells.</p> <p>18 Q Are the cells numbered?</p> <p>19 A Some are, some aren't.</p> <p>20 Q So on this photo, you see on the top left there's</p> <p>21 a sign it looks like, Cell 6?</p> <p>22 A Yes.</p> <p>23 Q Would that be the holding cell right under the</p> <p>24 sign that would be Number 6?</p>	<p>1 A Yes.</p> <p>2 Q And then there's some numbers 204, 208, what do</p> <p>3 those mean?</p> <p>4 A When we get the DOC in, a lot of times we'll</p> <p>5 separate them by courtroom when they come in. So once</p> <p>6 they're searched they'll go into that. As soon as were</p> <p>7 done receiving, the deputies from those courtrooms come</p> <p>8 down and get the prisoners so they're separated by</p> <p>9 courtroom.</p> <p>10 Q Is that Illinois Department of Corrections?</p> <p>11 A No. Department of corrections, the jail.</p> <p>12 Q So if people are in Cook County Jail --</p> <p>13 A Yes.</p> <p>14 Q -- they'll be brought over and they'll be placed</p> <p>15 in that particular cell?</p> <p>16 A For those particular courtrooms, yes.</p> <p>17 Q And do you know which particular courtrooms this</p> <p>18 Cell 6 relates to?</p> <p>19 A It looks like 204 and 208 I can see. It might be</p> <p>20 107 and 108. A lot of them correspond to the elevator</p> <p>21 that they're going to take up to. So there's different</p> <p>22 elevators to different sides of the building, so those</p> <p>23 would probably correlate to those.</p> <p>24 Q Are there other DOC holding cells that would</p>
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<p>1 correlate to other courtrooms?</p> <p>2 A Yes.</p> <p>3 Q And is that shown in any of the photos?</p> <p>4 A Not clearly.</p> <p>5 Q Would you know by looking at the photos which</p> <p>6 ones correlate to which courtrooms?</p> <p>7 A No.</p> <p>8 Q So if you went back to that holding cell area,</p> <p>9 would you be able to make that determination as to which</p> <p>10 holding cells for DOC detainees are related to which</p> <p>11 courtrooms?</p> <p>12 A When they're first brought in the morning,</p> <p>13 generally, yeah, there's a sign over the courtrooms that</p> <p>14 they do use -- or the holding cells that they do use. So</p> <p>15 they're usually separated by the courtrooms.</p> <p>16 Q In this photo, it looks like there's a holding</p> <p>17 cell sort of to the right and it looks like that has a</p> <p>18 sign above it, too?</p> <p>19 A Yes.</p> <p>20 Q Do you know what that sign says?</p> <p>21 A No.</p> <p>22 Q Would that be another DOC holding cell for</p> <p>23 courtrooms?</p> <p>24 A It's possible, yes.</p>	<p>1 Q How about the next photo, Detention Number 5,</p> <p>2 what is that showing?</p> <p>3 A That would be another holding cell down in the</p> <p>4 male detention.</p> <p>5 Q And there's a toilet on the left side?</p> <p>6 A Yes.</p> <p>7 Q So when you say detention, there's the main male</p> <p>8 lockup with a bunch of holding cells in it?</p> <p>9 A Yes.</p> <p>10 Q And when somebody is brought to the Bridgeview</p> <p>11 Courthouse, where do they go first, you know, to be</p> <p>12 processed?</p> <p>13 A They'll come through our dock, down the hallway</p> <p>14 through a metal detector, then they'll get searched and</p> <p>15 then they'll go into the male lockup.</p> <p>16 Q And what about the females?</p> <p>17 A They come in from the separate side.</p> <p>18 Q And they also get searched?</p> <p>19 A Yes.</p> <p>20 Q And they go into a different lockup?</p> <p>21 A Yes.</p> <p>22 Q And so there's sort of a main lockup for females</p> <p>23 and a main lockup for males?</p> <p>24 A Yes.</p>

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<p>1 Q And then they remain there until they're taken up</p> <p>2 to the courtroom?</p> <p>3 A Yes.</p> <p>4 Q Are there holding cells up by the courtrooms?</p> <p>5 A Yes.</p> <p>6 Q And so then they'll go to that holding cell, go</p> <p>7 to court, and then come back down?</p> <p>8 A Yes.</p> <p>9 Q And then when they come back down, are they</p> <p>10 placed in the same holding cell they were in, or could it</p> <p>11 be it different?</p> <p>12 A Could be anywhere.</p> <p>13 Q And this process that you've just described, does</p> <p>14 that matter if it's somebody who's in custody from DOC or</p> <p>15 a bond hearing from an outside agency or a transport from</p> <p>16 I DOC or an out of county, do they all follow the same</p> <p>17 process?</p> <p>18 A Yes. They're not all housed together.</p> <p>19 Q Right. So those particular holding cells with</p> <p>20 the signs that we talked about that are related to</p> <p>21 specific courtrooms for DOC people.</p> <p>22 A Yes.</p> <p>23 Q That would just be for DOC people?</p> <p>24 A Yes.</p>	<p>1 Q What about out of county people, would they have</p> <p>2 their own holding cells or can they be mixed?</p> <p>3 A They use one of these holdings cells, it could be</p> <p>4 a different one everyday.</p> <p>5 Q And what about people transported in from the</p> <p>6 IDOC, do they have their own cells?</p> <p>7 A They could be different. We try to keep them so</p> <p>8 they're not a lot of times in view of the other DOC.</p> <p>9 Q Okay. And then what about the bond hearing</p> <p>10 folks, do they have their own cells?</p> <p>11 A Yes.</p> <p>12 Q But they would all be within the general lockup?</p> <p>13 A Yes.</p> <p>14 Q How many holding cells are there down in the male</p> <p>15 general lockup?</p> <p>16 A I think it's like 17.</p> <p>17 Q How many holding cells are down in the female</p> <p>18 lockup?</p> <p>19 A I believe four.</p> <p>20 Q Do you want to look at something to help?</p> <p>21 A Yeah. There's 22 lockups, 22 different cells</p> <p>22 down in the lockup area, and I believe females only have</p> <p>23 four. So then that would be 18 for the males.</p> <p>24 Q All right. The next one is Detention D26. So we</p>
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<p>1 already saw one called D26. So the first D26, we were</p> <p>2 talking about with that sign, the cell 6 sign, that's</p> <p>3 Camera 0.034, right?</p> <p>4 A Right.</p> <p>5 Q And now this D26 is Camera 0.036?</p> <p>6 A Yes.</p> <p>7 Q And what is this showing?</p> <p>8 A That would be the control room. Right in the</p> <p>9 center would be the control room for the male side and</p> <p>10 the other, just the cells around it. So again, it's</p> <p>11 shaped like an H, so you would be on the right-hand side</p> <p>12 looking down of the center of the H.</p> <p>13 Q Got it.</p> <p>14 The control room, is that on the part of the H</p> <p>15 that crosses from left to right, if you will? It's a</p> <p>16 capital H?</p> <p>17 A It's a capital H.</p> <p>18 Q All right.</p> <p>19 A Here is a hallway which is what was on the other</p> <p>20 one, then down here is a corridor, and then this would be</p> <p>21 the corridor going back right out there. So this would</p> <p>22 be right in the middle. So there's cells behind it and</p> <p>23 then the cells alongside here and then cells over here</p> <p>24 (indicating).</p>	<p>1 Q And are there always sheriff's deputies in the</p> <p>2 control room?</p> <p>3 A Generally yes.</p> <p>4 Q Is that where the monitors are that have the</p> <p>5 camera feeds for the different holding cells down in the</p> <p>6 male lockup, are those located in the control room?</p> <p>7 A There are some of the older once in there, yes.</p> <p>8 Q Is there an old system and a new system in place</p> <p>9 at Bridgeview?</p> <p>10 A It's difficult to say, but yes, there are some</p> <p>11 old analog cameras that were supposedly also digital, but</p> <p>12 they didn't put monitors in a lot of the areas. Those</p> <p>13 are the old ones left over from the analog system. Those</p> <p>14 are the old, old monitors.</p> <p>15 Q Can we tell by looking at these photos whether</p> <p>16 they come from the old system or the new system?</p> <p>17 A No. Most of the old system was joined into the</p> <p>18 new system, but like the monitors that are in there are</p> <p>19 still only hooked up to, I believe, the old system.</p> <p>20 Q So the holding cells down in the male general</p> <p>21 lockup, they have the old system and the new system both</p> <p>22 in use? Not for one particular cell, but one cell might</p> <p>23 be the old system, and the one next to it might be the</p> <p>24 new system?</p>

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<p>1 A No. All of the cameras are merged into the new</p> <p>2 system, but again, the monitors there are from the old</p> <p>3 system. So they'll see whatever the same cameras see.</p> <p>4 Q Okay. So the monitors in the control room and</p> <p>5 the male lockup are they able to see the camera feeds</p> <p>6 from all of the holding cells down in that lockup?</p> <p>7 A If they're set to that, yeah. I believe there's</p> <p>8 only about four or eight of them in there. So they may</p> <p>9 be able to see whatever they're set to, and they can</p> <p>10 change. In other words, if they got a problem in one</p> <p>11 cell and they want to keep an eye on it, they can flip</p> <p>12 that on and watch it.</p> <p>13 Q Okay. So in this picture that we're looking at</p> <p>14 0.036 on the left there's some people in there in like</p> <p>15 like a cream colored --</p> <p>16 A Those would be the DOC.</p> <p>17 Q All right. And the person who's sitting straight</p> <p>18 ahead is not DOC?</p> <p>19 A No.</p> <p>20 Q Just somebody bumming out.</p> <p>21 The next one is Detention Number 6, what is this</p> <p>22 picture showing?</p> <p>23 A This is one of the cells that was redone for ADA</p> <p>24 compliance.</p>	<p>1 Q Okay. There's a toilet on the right?</p> <p>2 A Yes.</p> <p>3 Q Are there special holding cells for ADA people or</p> <p>4 people with disabilities?</p> <p>5 A They did come in and redo, I believe, it was only</p> <p>6 two of the cells.</p> <p>7 Q Is this Detention Number 6, and then Detention</p> <p>8 Number 7?</p> <p>9 A Yes.</p> <p>10 Q The Detention Number 6 photo, you see there's</p> <p>11 metal frame and glass and a little sign on it?</p> <p>12 A Yes.</p> <p>13 Q Is that the door?</p> <p>14 A That's the door.</p> <p>15 Q Does that slide to the left then?</p> <p>16 A Yes.</p> <p>17 Q And it will close on that frame where the Number</p> <p>18 6 is?</p> <p>19 A Yes.</p> <p>20 Q And so then it's centrally all glass is -- other</p> <p>21 than the metal frame, it would be an all glass door?</p> <p>22 MS. EKL: Objection.</p> <p>23 BY MR. ZIMMERMAN:</p> <p>24 Q For that holding cell?</p>
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<p>1 A That is the door right there (indicating).</p> <p>2 Q Detention Number 7, that photo, what is that</p> <p>3 showing?</p> <p>4 A That is another one of the ADA compliant.</p> <p>5 Q Okay. And there's obviously a toilet in that</p> <p>6 one. So you think that these are the only two that would</p> <p>7 be used for people with disabilities?</p> <p>8 A I believe those are the only two they redid</p> <p>9 because you can tell by the longer sinks.</p> <p>10 Q We're still on the male side?</p> <p>11 A Yes. Yeah, that would be the only two.</p> <p>12 Q Okay. So if there's nobody with a disability and</p> <p>13 you need holding cell space, would you put somebody who</p> <p>14 does not have a disability in Cell Number 6 or Cell</p> <p>15 Number 7?</p> <p>16 A I mean, it's possible.</p> <p>17 Q All right. Let's look at Number 8, Detention</p> <p>18 Number 8, what is this showing?</p> <p>19 A This is another cell in the male lockup.</p> <p>20 Q And the door here would slide to the left and</p> <p>21 connect with that metal bar with the 8 on it?</p> <p>22 A Yes.</p> <p>23 Q That's a toilet on the right?</p> <p>24 A Yes.</p>	<p>1 Q Then there's a detention D26, what is that photo</p> <p>2 showing. Oh, you have another D26. This is CAM 0.040.</p> <p>3 A This would be where we were looking at the other</p> <p>4 side the H, this is opposite view. And so then going</p> <p>5 back to the one 0.034 this would be the opposite view</p> <p>6 from 0.034.</p> <p>7 Q I see.</p> <p>8 Q Then there's Detention Number 9, and what is that</p> <p>9 photo showing?</p> <p>10 A That would be another cell in the male lockup.</p> <p>11 Q And there's a toilet on the back left?</p> <p>12 A Yes.</p> <p>13 Q The next one just says Detention Number and it's</p> <p>14 CAM 0.042. Do you see that?</p> <p>15 A Yes.</p> <p>16 Q What is that showing?</p> <p>17 A That would be another one on the male side.</p> <p>18 Q And there's a toilet on the back left?</p> <p>19 A Yes.</p> <p>20 Q And the next one is Detention Number 10, what is</p> <p>21 that showing?</p> <p>22 A Another cell on the male side.</p> <p>23 Q And there's a toilet on the back right?</p> <p>24 A Yes.</p>

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<p>1 Q The next one is Detention Number and it's CAM 2 0.044, what is that showing? 3 A That would be another cell in the male lockup 4 area. 5 Q And there's a toilet on the back right? 6 A Yes. 7 Q And the next is Detention Number 11, and what is 8 that showing? 9 A That would be another cell in the male lockup 10 area. 11 Q And there's a toilet on the left? 12 A Yes. 13 Q The next one just says detention and that's CAM 14 0.046, and what is that showing? 15 A That is showing the control room and then the 16 door going out into the booking area. 17 Q The booking area, is that straight ahead down the 18 hallway? 19 A Yes. Through that door. 20 Q Detention Number 16 what is that showing? 21 A That would be another cell in the male area. 22 Q Back to the one we were at the Detention, the 23 0.046, that's the male side? 24 A Yes.</p>	<p>1 Q Jumping back to Detention Number 16, there's a 2 toilet on the back left? 3 A Yes. 4 Q We have got another Detention D26, this is 0.048. 5 What is this showing? 6 A This is a cell that used to be used for some kind 7 of storage for property. It's not used anymore. 8 Q Not used? 9 A Not used. 10 Q And we go to Detention D26, it's CAM 0.049, and 11 what is this showing? 12 A This would be on the opposite side of the control 13 room on one of the legs of the H. 14 Q And the control room, is that on the room that's 15 on the left side of this? 16 A Yes. That's the control room. 17 Q The next one just says holding cell, and it's CAM 18 0.050. What is this? 19 A I believe that's another one of the cells on the 20 male side. 21 Q Male holding cell? 22 A Yes. 23 Q And there's a toilet on the back left? 24 A Yes.</p>
Page 28	Page 29
<p>1 Q And then we go to Detention D26, CAM 0.051. What 2 is this, sir? 3 A That would be another cell in the male detention 4 site. 5 Q And there's a toilet on the back left? 6 A Yes. 7 Q Was that Cell Number 13? 8 A It looks like it, yes. 9 Q The next photo just says Detention 0.052, and 10 what is this picture of? 11 A This is also a cell in the male detention area. 12 Q And there's a toilet on the right, correct? 13 A Yes. 14 Q The next one is General Area D60, and what is 15 this photo? 16 A These are interview rooms. 17 Q Is this the inmate side? 18 A Yes. 19 Q Is this for males or females or both? 20 A We can use it for both. 21 Q Where is that located? 22 A It's outside the actual lockup area and down 23 another hallway. 24 Q So it's not in the male or the female lockup?</p>	<p>1 A No. 2 Q Then we go to General Area D55, what is that 3 showing? 4 A That is another one of the interview rooms. 5 Q And this would be the attorney side? 6 A That would be. 7 Q Again for male or females? 8 A Yes. 9 Q And then we go to General Area D59. What is 10 that, sir? 11 A That would be an interview room. 12 Q This is the inmate side? 13 A Yes. 14 Q For male or females? 15 A Yes. 16 Q The next one is General Area D56. And what is 17 this photo? 18 A That is an interview room. 19 Q Is this the attorney side? 20 A No. That would be -- well, if you're looking 21 through the glass, that's the attorney side. To the 22 right of the picture is the inmate side. 23 Q Okay. And this would be for male or female? 24 A Yes.</p>

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<p>1 Q And then we have General Area D58 interview room</p> <p>2 right and which side are we looking at to the right of</p> <p>3 the glass?</p> <p>4 A The right of the glass, I believe that would be</p> <p>5 the attorney side.</p> <p>6 Q Male or female?</p> <p>7 A Yes.</p> <p>8 Q General Area D57, another interview room, right?</p> <p>9 A Yes.</p> <p>10 Q And which side are we looking at on the left of</p> <p>11 the glass here?</p> <p>12 A The left of the glass would be the attorney side.</p> <p>13 Q Male or female?</p> <p>14 A Yes.</p> <p>15 Q And then we go to Detention Room 1274. And what</p> <p>16 is that photo of?</p> <p>17 A This would be on the female side.</p> <p>18 Q So this would be one of the four female holding</p> <p>19 cells?</p> <p>20 A Yes.</p> <p>21 Q And there's a toilet on the back left?</p> <p>22 A Yes.</p> <p>23 Q So the first Detention Room 1274 that we were</p> <p>24 talking about is CAM 0.071 on the female side?</p>	<p>1 A Yes.</p> <p>2 Q Does that look like that's holding Cell Number 2?</p> <p>3 A Yes.</p> <p>4 Q And then we have Detention Room 1274, which is</p> <p>5 CAM 0.072. And what is this?</p> <p>6 A That would be another cell on the female side.</p> <p>7 Q Does that look like it's Cell Number 3?</p> <p>8 A It does look like it, yes.</p> <p>9 Q And there's a toilet on the left?</p> <p>10 A Yes.</p> <p>11 Q Is this an ADA compliant cell?</p> <p>12 A I believe so.</p> <p>13 Q It's got the long sink, right?</p> <p>14 A Right.</p> <p>15 Q Then we have holding Cam 0.076. And what is this</p> <p>16 of?</p> <p>17 A I believe that's one of the courtrooms upstairs,</p> <p>18 so that would be on the first floor.</p> <p>19 Q All right. So where are the photos of the other</p> <p>20 two female holding cells? I guess it would be Cells</p> <p>21 number 1 and 4.</p> <p>22 A Generally they don't use one. And like I said,</p> <p>23 we don't get a lot of females. So I think generally they</p> <p>24 only use two and three, but I am not positive.</p>
Page 32	Page 33
<p>1 Q So if there was a female with a disability then,</p> <p>2 she would be placed in that ADA cell, looks like Number</p> <p>3 3?</p> <p>4 A Yes.</p> <p>5 Q If you had a need for that ADA cell because you</p> <p>6 had too many females, would you put a non-disabled female</p> <p>7 in it?</p> <p>8 A We generally don't like to, but if there was an</p> <p>9 overflow we may. It hasn't happened as much as I am</p> <p>10 aware of. We very rarely get handicapped females that</p> <p>11 require wheelchairs or that, maybe once every several</p> <p>12 months, so it doesn't come up that often.</p> <p>13 Q All right. So we're back to Holding 0.076 and</p> <p>14 you think this is a holding cell for a courtroom on the</p> <p>15 first floor?</p> <p>16 A That would be on the first floor.</p> <p>17 Q How many courtrooms are there in the Bridgeview</p> <p>18 Courthouse that are used for criminal cases?</p> <p>19 A We have 20 different courtrooms. Are you talking</p> <p>20 breaking it down for civil and that, I don't have that</p> <p>21 breakdown.</p> <p>22 Q Do you know which courtroom numbers are used for</p> <p>23 criminal?</p> <p>24 A Not offhand.</p>	<p>1 Q So when we go through these photos that we</p> <p>2 haven't gone through yet and we talk about holding cells</p> <p>3 that are used for the particular courtrooms, would you be</p> <p>4 able to state whether they're for a criminal courtroom or</p> <p>5 civil courtroom?</p> <p>6 A Most of the civil stuff is upstairs, and they</p> <p>7 don't really have lockups, so it would be either</p> <p>8 misdemeanor or felony most of the once on the first</p> <p>9 floor.</p> <p>10 Q All right. So the holding cell in CAM 0.076, you</p> <p>11 think that's for a criminal courtroom on the first floor?</p> <p>12 A It's either for 101 or 102. 102 is misdemeanor.</p> <p>13 101 is criminal. I can't tell by looking at it offhand.</p> <p>14 Q 101 is misdemeanor and 102 is what?</p> <p>15 A 102 is misdemeanor. 101 is felony.</p> <p>16 Q Are there holding cells outside the misdemeanor</p> <p>17 courtrooms?</p> <p>18 A They would be in the same pictures, yes.</p> <p>19 Q So this one in 0.076 might be the holding cell</p> <p>20 that's used for Courtrooms 101 or 102?</p> <p>21 A Yes.</p> <p>22 Q And if you went back to the office, would be be</p> <p>23 able to tell which one?</p> <p>24 A Yes.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q Is there a monitoring room somewhere else other 2 than the main control room that would have those video 3 feeds for the holding cells from the courtrooms go into 4 them? 5 A No. 6 Q So all of the cameras that monitor holding cells 7 throughout the entire courthouse, the video feeds go to 8 the main control room, and that's it? 9 A No. The main feeds go into the superintendent's 10 office and those he can pull up any camera that he wants 11 to off of those. 12 Q Okay. 13 A The ones downstairs, they would mainly be on 14 whatever was lockup area. They're usually preset. The 15 elec techs come in and preset them. 16 Q It there a control room on the female holding 17 side? 18 A There is a control room that where they first 19 come in. So it's a control room that looks out into the 20 dock area. And then if they're looking out the window, 21 they're left side would be female, they're left side 22 would be male. There's a separate door going in going 23 down to each courtroom. So yes, there would be a control 24 room there.</p>	<p style="text-align: right;">Page 35</p> <p>1 Q All right. So the video feeds for the holding 2 cells in the female lockup area, where do those go, what 3 monitor? 4 A They're not always monitored. 5 Q Where do they go? 6 MS. EKL: Objection to form. 7 BY MR. ZIMMERMAN: 8 Q Do they go to the main control room on the male 9 side? 10 A No. 11 Q Do they go to the big control room when people 12 come in to be processed initially? 13 A If they're set to monitor those, if they set them 14 on there, yeah. But most of the time, they're set up to 15 look at the dock because they're also the ones that have 16 to let in all of the vehicles, the buses, all of that. 17 So most of there's are actually monitoring the dock 18 areas. And then they have to, at the other end, coming 19 down the hallway to get into the lockup area, there's a 20 set a doors, too. So generally, there are cameras set on 21 those to monitor those. 22 Q So I am just trying to figure out if somebody 23 wanted to monitor the female holding cells, which control 24 room would allow that?</p>
<p style="text-align: right;">Page 36</p> <p>1 A I mean, it's possible that they can bring up 2 those cameras. 3 Q And what do you call that control room that 4 you're referring to? 5 A That would be the intake control room. 6 Q Okay. Is that staffed by male and female 7 sheriff's deputies? 8 A Generally two females. 9 Q And the intake control room? 10 A Yes. 11 Q And who staffs the control room in the male 12 lockup, is it males and females? 13 A No, males. 14 Q Males only. 15 All right. Let's get back to photos now. So 16 the next one is Holding nd it's 1.011. What is that one 17 showing? 18 A That would be the hallway in between the 19 courtrooms so that would be the door to -- that would be 20 the courtroom door for 102, and behind the camera would 21 be the courtroom door for 101. 22 Q I see. And so to the right side on that photo, 23 are those holding cells? 24 A They're mostly interview rooms.</p>	<p style="text-align: right;">Page 37</p> <p>1 Q So where would the holding cell be in this 2 picture? 3 A To the left. 4 Q So the two windows on the right side are 5 interview rooms? 6 A Yes. 7 Q And then across from each interview room is a 8 holding cell? 9 A Yes. 10 Q And so the photo that we just looked at Holding 11 0.076. 12 A Yes. 13 Q That would be one of those two holding cells 14 that's shown in this 1.011 photo? 15 A Yes. 16 Q What's our next photo here. Holding 1.014. What 17 is that showing? 18 A I believe that's just the opposite end of that 19 same hallway. 20 Q So the big wooden door would be Courtroom 101? 21 A Yes. 22 Q And then the holding cells are on the right and 23 interviews rooms are on the left? 24 A Yes.</p>

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<p>1 Q The next one is Holding 1.022. What is that</p> <p>2 showing?</p> <p>3 A I believe those are the holding cells for 103 and</p> <p>4 104.</p> <p>5 Q All right. So that door that you see at the end</p> <p>6 of the hallway, is that Courtroom 103 or 104?</p> <p>7 A 103.</p> <p>8 Q And then across from those -- Strike that.</p> <p>9 So the holding cell closest to Courtroom 103</p> <p>10 would be the holding cell that people would likely be put</p> <p>11 into if they're going to Courtroom 103?</p> <p>12 A Yes.</p> <p>13 Q And then the holding cell closest to us in this</p> <p>14 photo, is that the holding cell that the person would</p> <p>15 likely be put in if they're going to Courtroom 104?</p> <p>16 A Yes.</p> <p>17 Q And then across from those would be the interview</p> <p>18 rooms?</p> <p>19 A Yes.</p> <p>20 Q Let's back up. Camera 1.011.</p> <p>21 A Okay.</p> <p>22 Q So that door, I think you said, was for Courtroom</p> <p>23 102?</p> <p>24 A Yes.</p>	<p>1 Q So then the holding cell closest to that would be</p> <p>2 the holding cell that a person would be put in if they're</p> <p>3 going to Courtroom 102?</p> <p>4 A Yes.</p> <p>5 Q And then the holding cell closest to us on the</p> <p>6 left would be the holding cell the person would be put in</p> <p>7 if they're going to Courtroom 101?</p> <p>8 A Yes.</p> <p>9 Q All right. Next one is Holding 1.025. What are</p> <p>10 we looking at here?</p> <p>11 A So that would be probably -- yeah, that would be</p> <p>12 the camera looking at Courtroom 104, so the opposite end</p> <p>13 of the hallway.</p> <p>14 Q All right. And then the holding cells for</p> <p>15 Courtroom 104 and 103 are on the left?</p> <p>16 A Yes.</p> <p>17 Q And the interview rooms are on the right?</p> <p>18 A Yes.</p> <p>19 Q Then we have Holding 1.060. What are we looking</p> <p>20 at there?</p> <p>21 A That would be -- those two would both be either</p> <p>22 103 or 104 holding cells.</p> <p>23 Q All right. So 1.060 is a holding cell for</p> <p>24 Courtroom --</p>
Page 40	Page 41
<p>1 A I believe that's 104.</p> <p>2 Q 104. And then 1.061 is the holding cell for</p> <p>3 Courtroom 103?</p> <p>4 A I believe so, yes.</p> <p>5 Q So if we look back at Cam 1.022.</p> <p>6 A Okay.</p> <p>7 Q So that wooden door is Courtroom 103?</p> <p>8 A Yes.</p> <p>9 Q So the holding cell just to the right of that</p> <p>10 would be the photo of the holding cell shown in 1.061?</p> <p>11 A I believe so, yes.</p> <p>12 Q And then back to 1.022 again, the hallway. We</p> <p>13 just had it.</p> <p>14 A Okay.</p> <p>15 Q So the holding cell to the right that's closest</p> <p>16 to us with that sort of cardboard paper on it.</p> <p>17 A Yes.</p> <p>18 Q That would be shown in the Photo 1.060?</p> <p>19 A Yes.</p> <p>20 Q All right. Are there toilets in those holding</p> <p>21 cells outside the courtrooms?</p> <p>22 A In 1.061 and 1.061?</p> <p>23 Q Right?</p> <p>24 A Yes.</p>	<p>1 Q And what about if we backed up to 0.076, that was</p> <p>2 the holding cell for Courtroom 101 and Courtroom 102, is</p> <p>3 there a toilet in that?</p> <p>4 A Yes.</p> <p>5 Q Do we have the picture of a holding cell that</p> <p>6 would correspond with Courtroom 101 or 102 other than</p> <p>7 this one, 0.076. There should be another one, right?</p> <p>8 Maybe we'll get to it</p> <p>9 A Maybe. It's hard to tell. They all look alike.</p> <p>10 They're all exactly the same.</p> <p>11 Q All right. Let's move on. The next one is</p> <p>12 Holding 1.062. What do we see in here?</p> <p>13 A 62, 63, and 64 are all of the interview rooms.</p> <p>14 MS. EKL: Can I just make sure I have -- so 1.061,</p> <p>15 what's the next document that you have in the packet</p> <p>16 after that. Is it 1.062? I thought you were referring</p> <p>17 to some others I don't have.</p> <p>18 MR. ZIMMERMAN: Well, there's a 1.022, 1.025.</p> <p>19 MS. EKL: I have 1.022, 1.025, then 1.060, 1.061 and</p> <p>20 1.062.</p> <p>21 MR. ZIMMERMAN: We're on 1.062 now.</p> <p>22 MS. EKL: I don't know why I thought you mentioned a</p> <p>23 number that I didn't have.</p> <p>24 MR. ZIMMERMAN: We had a 0.076.</p>

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<p>1 MS. EKL: That's the one I'm missing. Where is that</p> <p>2 one?</p> <p>3 MR. ZIMMERMAN: Do you need a copy?</p> <p>4 MS. EKL: I just don't see it in here. At the end it</p> <p>5 goes 75, and then mine skips to 2.039. I don't know if</p> <p>6 it's out of order or I'm missing it. I don't see it.</p> <p>7 MR. ZIMMERMAN: He's going to print it.</p> <p>8 MS. EKL: Thank you.</p> <p>9 BY MR. ZIMMERMAN:</p> <p>10 Q We are on Holding 1.062. That's an interview</p> <p>11 room, right?</p> <p>12 A Yes.</p> <p>13 Q Up near the courtroom?</p> <p>14 A Yes.</p> <p>15 Q All right. How about Holding 1.063, that's also</p> <p>16 an interview room?</p> <p>17 A Yes.</p> <p>18 Q And that's near a courtroom?</p> <p>19 A Yes.</p> <p>20 Q Do you know which courtroom those are near?</p> <p>21 A It's hard to tell from these.</p> <p>22 Q Well, at least we got the big cardboard thing?</p> <p>23 A That one will tell you that it's outside 104.</p> <p>24 Q Outside Room 104. That would be 1.062?</p>	<p>1 A Yes.</p> <p>2 Q All right. How about Holding 1.064, interview</p> <p>3 room?</p> <p>4 A Yes.</p> <p>5 Q Outside of a courtroom?</p> <p>6 A Yes.</p> <p>7 Q And can you tell which one?</p> <p>8 A I can't.</p> <p>9 Q How about Holding 1.065, what are we looking at</p> <p>10 there?</p> <p>11 A That would be one of the lockups for one of the</p> <p>12 courtrooms.</p> <p>13 Q A holding cell outside of the courtroom?</p> <p>14 A Yes.</p> <p>15 Q And do you know which courtroom?</p> <p>16 A I cannot tell from this now.</p> <p>17 Q All right. If you went back to the office, you'd</p> <p>18 be able to tell?</p> <p>19 A Yes. I'd find the courtroom with the rust stains</p> <p>20 on the bench.</p> <p>21 Q And then is 1.066 holding, it's a holding cell</p> <p>22 outside of the a courtroom?</p> <p>23 A Yes.</p> <p>24 Q Can you tell which courtroom?</p>
Page 44	Page 45
<p>1 A No, not from this.</p> <p>2 Q So we talked about Courtrooms 101, 102, 103, and</p> <p>3 104, what other felony or misdemeanor courtrooms are</p> <p>4 there?</p> <p>5 A There's 109, 110, 107, and 108, those would be</p> <p>6 the ones on the first floor.</p> <p>7 Q Are there some on the second floor?</p> <p>8 A Most of the second floor is civil, traffic, or</p> <p>9 domestic violence.</p> <p>10 Q Is there a third floor?</p> <p>11 A No.</p> <p>12 Q All right. So we got Courtrooms 101, 2, 3, 4,</p> <p>13 107, 8, 9, and 10 would be the criminal ones?</p> <p>14 A Yes.</p> <p>15 Q All right. Let's go back to our photos, Holding</p> <p>16 1.067, is that an interview room?</p> <p>17 A That would be an interview room.</p> <p>18 Q Outside of a courtroom?</p> <p>19 A Yes.</p> <p>20 Q And can you tell which courtroom by looking at</p> <p>21 that?</p> <p>22 A No.</p> <p>23 Q Holding 1.068, is that a holding cell outside of</p> <p>24 a courtroom?</p>	<p>1 A That would be a holding cell outside of a</p> <p>2 courtroom.</p> <p>3 Q And can you tell which courtroom from looking at</p> <p>4 it?</p> <p>5 A No.</p> <p>6 Q Holding 1.069, is that a holding cell outside of</p> <p>7 a courtroom?</p> <p>8 A Yes.</p> <p>9 Q And can you tell which courtroom?</p> <p>10 A No.</p> <p>11 Q Holding 1.070, is that an interview room?</p> <p>12 A Yes.</p> <p>13 Q Outside of a courtroom?</p> <p>14 A Yes.</p> <p>15 Q Can you tell which courtroom?</p> <p>16 A No.</p> <p>17 Q Holding 1.071, is that an interview room?</p> <p>18 A Yes.</p> <p>19 Q Outside of a courtroom?</p> <p>20 A Yes.</p> <p>21 Q And can you tell which courtroom?</p> <p>22 A No.</p> <p>23 Q Holding 1.072, is that an interview room?</p> <p>24 A Yes.</p>

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<p>1 Q Outside of a courtroom?</p> <p>2 A Yes.</p> <p>3 Q And can you tell which courtroom?</p> <p>4 A No.</p> <p>5 Q Holding 1.073, is that an interview room?</p> <p>6 A Yes.</p> <p>7 Q Outside of a courtroom?</p> <p>8 A Yes.</p> <p>9 Q Can you tell which courtroom?</p> <p>10 A No.</p> <p>11 Q Holding 1.074, is that a holding cell?</p> <p>12 A Yes.</p> <p>13 Q Outside of a courtroom?</p> <p>14 A Yes.</p> <p>15 Q Can you tell which courtroom?</p> <p>16 A No.</p> <p>17 Q Holding 1.075, is that a holding cell?</p> <p>18 A Yes.</p> <p>19 Q Outside of a courtroom?</p> <p>20 A Yes.</p> <p>21 Q Can you tell which courtroom?</p> <p>22 A No.</p> <p>23 Q All right. But you think that all of these</p> <p>24 holding cells photos and interview room photos that we</p>	<p>1 looked at that you weren't able to tell which courtroom</p> <p>2 they were associated with that if you went back to the</p> <p>3 office, you would be able to identify them?</p> <p>4 A I would have to go courtroom and courtroom and</p> <p>5 compare the picture, yes.</p> <p>6 Q All right. Let's go to the next one, Courtroom</p> <p>7 Number 204 cell. So does that tell us there's a criminal</p> <p>8 court up on the second floor?</p> <p>9 A This would actually be the domestic violence</p> <p>10 courtroom.</p> <p>11 Q And there's a holding cell for the domestic</p> <p>12 violence courtroom?</p> <p>13 A Yes.</p> <p>14 Q Is there a toilet in that cell?</p> <p>15 A I believe so.</p> <p>16 Q And this would be outside of Courtroom 204?</p> <p>17 A Right.</p> <p>18 Q So if someone was going to Courtroom 204, they</p> <p>19 would likely be placed in this holding cell?</p> <p>20 A Yes.</p> <p>21 Q How about Courtroom 204 inmate holding, what is</p> <p>22 that looking at?</p> <p>23 A This is the outside of that holding cell, and</p> <p>24 this would be like an interview area.</p>
Page 48	Page 49
<p>1 Q How about Courtroom 207 inmate holding, what is</p> <p>2 that?</p> <p>3 A That would be for 207 and 208, and that would be</p> <p>4 more or less the interview area, and then left and right,</p> <p>5 you would see the holding cell doors.</p> <p>6 Q So in this picture on the left, it looks like</p> <p>7 there's a sign on there 207-208?</p> <p>8 A Could be 208, could be 209.</p> <p>9 Q And then there's another holding cell on the far</p> <p>10 left of the picture. And so are these holding cells for</p> <p>11 Courtrooms 207 and 208?</p> <p>12 A Yes.</p> <p>13 Q And what are those courtrooms, domestic violence</p> <p>14 again?</p> <p>15 A 207 is misdemeanor, 208, I believe is traffic.</p> <p>16 Sometimes the calls vary.</p> <p>17 Q Okay. And the next one is Courtroom Number 207</p> <p>18 cell, is this the holding cell that's used for people who</p> <p>19 are going to Courtroom 207?</p> <p>20 A Yes.</p> <p>21 Q Is there a toilet in there?</p> <p>22 A Yes.</p> <p>23 Q The next one is Courtroom Number 208 cell, is</p> <p>24 this the holding cell that's used for people who are</p>	<p>1 going to Courtroom 208?</p> <p>2 A Yes.</p> <p>3 Q Is there a toilet in there?</p> <p>4 A Yes.</p> <p>5 Q Let's go back to Detention D26. This was one of</p> <p>6 the earlier ones, CAM 0.034. That's the one that had the</p> <p>7 sign, that Cell 6, I can show it to you make it easier to</p> <p>8 find.</p> <p>9 A Okay.</p> <p>10 Q So this would be used for DOC folks going to</p> <p>11 Courtrooms 204 and 208, 204 was domestic violence and 208</p> <p>12 was --</p> <p>13 A Traffic.</p> <p>14 Q Traffic.</p> <p>15 A If we had anybody for those courtrooms, yes.</p> <p>16 Q Okay.</p> <p>17 A And again, if you look at that Cell Number 6,</p> <p>18 that sign under there, that just means that they'll use</p> <p>19 that elevator going up that side of the building. So</p> <p>20 those would be like 107, 108, 204, 208 -- well, 204 would</p> <p>21 be on the other side. So 208, that would be on one side,</p> <p>22 so they would take the elevator up there.</p> <p>23 Q I see. So it's more of a convenience and it's</p> <p>24 easier --</p>

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<p>1 A If it's used. Again, we don't get a lot for</p> <p>2 those courtrooms.</p> <p>3 Q Are there any other cameras in the Bridgeview</p> <p>4 Courthouse that we don't have pictures of their views in</p> <p>5 this stack?</p> <p>6 MS. EKL: Objection to form.</p> <p>7 THE WITNESS: Answer?</p> <p>8 MS. EKL: Yes.</p> <p>9 BY THE WITNESS:</p> <p>10 A Yes.</p> <p>11 BY MR. ZIMMERMAN:</p> <p>12 Q And where are those located?</p> <p>13 A Pretty much every public area and a lot of the</p> <p>14 private hallways; front door, back door, outside.</p> <p>15 Q Are there any other holding cells in the</p> <p>16 Bridgeview Courthouse that are not shown in any of the</p> <p>17 views in these photos?</p> <p>18 A Not that I'm aware of.</p> <p>19 Q Other than one that we were missing outside of</p> <p>20 Courtroom 101 or 102, we only had one holding cell?</p> <p>21 A Okay.</p> <p>22 Q But other than that issue, you're not aware of</p> <p>23 any?</p> <p>24 A I'm not aware of any others?</p>	<p>1 MS. EKL: Object to the form of the question.</p> <p>2 BY MR. ZIMMERMAN:</p> <p>3 Q Well there's only one photo that was in this</p> <p>4 stack of a holding cell outside Courtrooms 101 and 102;</p> <p>5 isn't that right?</p> <p>6 A Well, it's hard to discern which ones are which,</p> <p>7 they all look the same. So I don't know if that picture</p> <p>8 is missing from 101 or 102, or if one of the other</p> <p>9 pictures were 101 and 102. All the courtrooms on the</p> <p>10 first floor look exactly the same. All lockups look</p> <p>11 exactly the same.</p> <p>12 Q I see. Well, we'll follow-up with your attorney</p> <p>13 on that one.</p> <p>14 Are there any other holding cell cameras in the</p> <p>15 Bridgeview Courthouse whose views are not shown in any of</p> <p>16 these photos?</p> <p>17 A I don't believe so.</p> <p>18 Q All right. So I'd like you to ask you now about</p> <p>19 Exhibit No. 4. There are a few inspection checklists at</p> <p>20 the very end of that starting on Page 807. It's actually</p> <p>21 the last five pages, I believe.</p> <p>22 A Okay. 807.</p> <p>23 Q Okay. So first off, let's go to the dep notice.</p> <p>24 You can unclip that and put them on top so you don't have</p>
Page 52	Page 53
<p>1 to hold it.</p> <p>2 A Okay.</p> <p>3 Q Can you look at Exhibit No. 2 for me, sir?</p> <p>4 A Okay.</p> <p>5 Q All right. So this is another Rule 30(b)(6)</p> <p>6 deposition notice regarding various topics listed in</p> <p>7 items one through eight on Pages 1 and 2 relative to</p> <p>8 certain documents in the schedule of documents. And I</p> <p>9 ask you, are you the designated representative produced</p> <p>10 here today on behalf of the Defendants to testify</p> <p>11 concerning the knowledge of the Defendants relative to</p> <p>12 the topics in one through eight concerning any of the</p> <p>13 schedule of document in those paragraphs, one through</p> <p>14 eight?</p> <p>15 A Pertaining to Bridgeview Courthouse, yes.</p> <p>16 Q Pertaining to Bridgeview Courthouse, right.</p> <p>17 So which of the schedule of documents numbers</p> <p>18 are you testifying about? It would be on Pages 3 and 4.</p> <p>19 I guess it would be Pages 2 and 3 down at the bottom,</p> <p>20 schedule of documents?</p> <p>21 A Okay. Number 6.</p> <p>22 Q And what about 8?</p> <p>23 A I'm still reading it. I would not have that</p> <p>24 information.</p>	<p>1 MS. EKL: You can, as the others, ask him whether a</p> <p>2 document exists that he's aware of in relation to Number</p> <p>3 8. We did not produce such a document, you can ask him</p> <p>4 if he's aware of one existing within the Bridgeview</p> <p>5 facility.</p> <p>6 BY MR. ZIMMERMAN:</p> <p>7 Q Are there any documents or logs that are kept of</p> <p>8 the people who are brought to the Bridgeview Courthouse</p> <p>9 when they come in and they're processed, is there</p> <p>10 information that's kept about them?</p> <p>11 A No.</p> <p>12 Q All right. Let's say somebody comes to the</p> <p>13 Bridgeview Courthouse and they're in custody of the DOC,</p> <p>14 what information does the sheriff's office record about</p> <p>15 those people?</p> <p>16 MS. EKL: Objection. Form. Assumes facts not in</p> <p>17 evidence. Go ahead.</p> <p>18 BY THE WITNESS:</p> <p>19 A There is a person that's assigned to our lockup</p> <p>20 that works for the Department of Corrections, they input</p> <p>21 all of the information. They would scan the ID cards for</p> <p>22 those already in DOC, and that information would be kept</p> <p>23 in CCOMS.</p> <p>24 BY MR. ZIMMERMAN:</p>

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<p>1 Q And this CCOMS system is that something that the</p> <p>2 sheriff's office has access to?</p> <p>3 A Yes.</p> <p>4 Q So this DOC person that inputs the information,</p> <p>5 is that an employee of the sheriff?</p> <p>6 A Yes.</p> <p>7 Q And what information would be loaded in the CCOMS</p> <p>8 after they scan the ID card information about that</p> <p>9 person?</p> <p>10 A Just what time they arrived at Bridgeview and</p> <p>11 what time they left.</p> <p>12 Q Would it have their name?</p> <p>13 A It would be a scan, so I'm assuming that it would</p> <p>14 connect to whatever they have already in CCOMS. So if</p> <p>15 they're in DOC, they're already entered into CCOMS,</p> <p>16 there's already a file in there. So when they come by</p> <p>17 us, they would scan the ID card, it would say that they</p> <p>18 are now at Bridgeview Courthouse. On the way out, they</p> <p>19 would usually scan all the cards on the way out so they</p> <p>20 know what time they left.</p> <p>21 Q And what if they're not already in CCOMS, how</p> <p>22 would that person be processed?</p> <p>23 A That same person from DOC would enter all of the</p> <p>24 information into CCOMS.</p>	<p>1 Q And what would the information be that they would</p> <p>2 enter in, name?</p> <p>3 A Name.</p> <p>4 Q Address?</p> <p>5 A I'm uncertain on that. If possible contact</p> <p>6 person, bond, things on that order.</p> <p>7 Q Okay. What about general question now. If</p> <p>8 somebody came in with a disability, wheelchair for</p> <p>9 example, would that be recorded anywhere?</p> <p>10 A Possibly, yeah. There's a unit that handles ADA</p> <p>11 compliance, so yes.</p> <p>12 Q And is there a system that would be entered into?</p> <p>13 A It would be that CCOMS.</p> <p>14 Q Would it be even if it was, let's say, somebody</p> <p>15 just coming in for a bond hearing, they would get in the</p> <p>16 CCOMS, too?</p> <p>17 A Once they're entered into the court system. So</p> <p>18 if they get a bond, then they're entered into the court</p> <p>19 system, into the CCOM system.</p> <p>20 Q Okay. What if somebody came in for a bond</p> <p>21 hearing that was brought from an outside agency, how</p> <p>22 would that processing work?</p> <p>23 A Same thing. If they receive a bond, then they</p> <p>24 would come back -- I believe they come back downstairs,</p>
Page 56	Page 57
<p>1 and they get entered into CCOMS.</p> <p>2 Q All right. And what happens when they present to</p> <p>3 the courthouse initially though before they go to court,</p> <p>4 how are they processed?</p> <p>5 A The arresting agency brings them in, they have a</p> <p>6 packet of paperwork. We kind of check through it to make</p> <p>7 sure everything is there, and then they go up to the</p> <p>8 clerk's office and clerk it. And then that file goes to</p> <p>9 the courtroom.</p> <p>10 Q And does the sheriff's office keep any</p> <p>11 information out of that packet of papers?</p> <p>12 A The name and where they're going.</p> <p>13 Q Name and courtroom?</p> <p>14 A Yes.</p> <p>15 Q And so that's entered into some log somewhere</p> <p>16 that you would maintain?</p> <p>17 A Yes.</p> <p>18 Q What if somebody is transported to Bridgeview</p> <p>19 Courthouse from IDOC, how does that processing work?</p> <p>20 A IDOC maintains their own prisoners, so they never</p> <p>21 go into our custody.</p> <p>22 Q And so is there a log that you would keep that</p> <p>23 would at least identify that they brought some prisoners</p> <p>24 over?</p>	<p>1 A Yes.</p> <p>2 Q And what information would be on that log?</p> <p>3 A The officers who brought them and what time they</p> <p>4 arrived, what time they left.</p> <p>5 Q And would it have any identifying information</p> <p>6 about the prisoner?</p> <p>7 A I'm not aware of that.</p> <p>8 Q It may or may not, you just don't know?</p> <p>9 A Yeah, I'm not sure.</p> <p>10 Q What if somebody was brought to Bridgeview who</p> <p>11 came from outside the county, how would they be</p> <p>12 processed?</p> <p>13 A The same as IDOC. They'd stay in their custody.</p> <p>14 Q Okay. And then what information would your</p> <p>15 office maintain about that person?</p> <p>16 A Again, the agency coming in and probably the name</p> <p>17 of the prisoner.</p> <p>18 Q About how many people per day would you estimate</p> <p>19 come to the Bridgeview Courthouse who are in the custody</p> <p>20 of DOC?</p> <p>21 A We average around 35 to 45.</p> <p>22 Q Men and women combined?</p> <p>23 A Males. Females, generally no more than three to</p> <p>24 five.</p>

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<p>1 Q About how many people would you estimate come to</p> <p>2 the Bridgeview Courthouse from an outside agency for a</p> <p>3 bond hearing per day?</p> <p>4 A Average, around 15.</p> <p>5 Q Is that males or both?</p> <p>6 A Males. Maybe several a week for females.</p> <p>7 Q About how many people would you estimate come to</p> <p>8 the Bridgeview Courthouse a day who are transported from</p> <p>9 IDOC?</p> <p>10 A Probably one to three a day.</p> <p>11 Q Is that male and female?</p> <p>12 A It could be.</p> <p>13 Q I mean the one to three, is that combined?</p> <p>14 A Yes, that's combined.</p> <p>15 Q And then about how many people would you estimate</p> <p>16 come to the Bridgeview Courthouse that are coming from</p> <p>17 outside of the county per day?</p> <p>18 A I don't see too many, so maybe only several a</p> <p>19 month. We don't get a lot.</p> <p>20 Q Is there any record kept of which holding cell a</p> <p>21 particular person is going to be placed in?</p> <p>22 A No.</p> <p>23 Q All right. Let's talk about schedule of</p> <p>24 document, item Number 6 from Exhibit No. 2.</p>	<p>1 A Okay.</p> <p>2 Q And this brings us to the checklists. I know we</p> <p>3 talked about this in the beginning, but I don't remember</p> <p>4 your answer or even if I asked the question, so let's try</p> <p>5 it again.</p> <p>6 How did you go about conducting your search, if</p> <p>7 you did the search, to obtain these inspection</p> <p>8 checklists?</p> <p>9 A My administrative assistant, I asked her to pull</p> <p>10 all the inspection sheets that have been completed.</p> <p>11 Q Oh, yeah. We did talk about it this.</p> <p>12 MS. EKL: You did, right at the beginning.</p> <p>13 BY MR. ZIMMERMAN:</p> <p>14 Q Okay. I just pulled a few out, so why don't we</p> <p>15 talk about Bates number 807.</p> <p>16 A Okay. Down in the bottom box, it asks if work</p> <p>17 orders were submitted, and there's a bunch of work order</p> <p>18 numbers and then there's a box that says copies of any</p> <p>19 documentation attached and it's checked off, yes; do you</p> <p>20 see that?</p> <p>21 A Yes.</p> <p>22 Q So would the work orders normally be attached to</p> <p>23 this inspection checklist?</p> <p>24 A Not always.</p>
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<p>1 Q And why not?</p> <p>2 A They never ask for them.</p> <p>3 Q Who doesn't?</p> <p>4 A These all go to the chief of court's office and</p> <p>5 chief of courts doesn't always ask for the work orders.</p> <p>6 Q All right. So if you look at Number 13, video</p> <p>7 system is recording and operational and she checked off</p> <p>8 no. So do you know if any of these work orders relate to</p> <p>9 that?</p> <p>10 A Actually, I don't know why she's checking it off.</p> <p>11 Q It says inspection conducted by D/S C. Collins?</p> <p>12 A That would be my administrative assistant.</p> <p>13 Q She did the inspection?</p> <p>14 A She does a lot of the legwork for me, yes.</p> <p>15 Q Well, we'll get these work orders. Let's go to</p> <p>16 the next page, that's 778. And again we have a bunch of</p> <p>17 work orders that are noted on here, but we don't -- we</p> <p>18 only have one that's attached to it, that's number 779</p> <p>19 that's request ID 313321. So do you know why the other</p> <p>20 work orders are not attached?</p> <p>21 A I believe when they asked for this information,</p> <p>22 they asked for any work orders related to the cameras.</p> <p>23 Q Okay. So WHO asked THAT --</p> <p>24 MS. EKL: I'm going to object. You're getting into</p>	<p>1 attorney/client communications. But the request was for</p> <p>2 work orders related to cameras and so we gave you</p> <p>3 documents regarding the unit head inspections, which</p> <p>4 there was an inspection checklist separately, you asked</p> <p>5 for information related to the cameras, which was a</p> <p>6 different request. And so that's why you also received</p> <p>7 work orders that were specific to the cameras.</p> <p>8 BY MR. ZIMMERMAN:</p> <p>9 Q So when you did your compilation of inspection</p> <p>10 checklists, and the checklists may have referenced a work</p> <p>11 order, did you or anybody else look at those work orders</p> <p>12 to see what they were about and which ones should be</p> <p>13 produced or not produced?</p> <p>14 A I had Deputy Collins go through the work order</p> <p>15 log to see which ones were camera related. I told her to</p> <p>16 pull anything that was camera related.</p> <p>17 Q All right. So only camera-related work orders</p> <p>18 were produced?</p> <p>19 A Yes.</p> <p>20 Q So if we go back to Number 807 and Item 13, video</p> <p>21 system is regarding and operational is checked no, then</p> <p>22 why weren't work orders related to that produced?</p> <p>23 A She does not have -- the deputy who fills this</p> <p>24 out does not have access to the video system. I don't</p>

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<p>1 know why she's checking no.</p> <p>2 Q So for Number 778, that Number 13 video system is</p> <p>3 recording and operational, that's checked off no. But a</p> <p>4 work order for a camera is produced.</p> <p>5 A Right, that's what I am thinking.</p> <p>6 Q So how do we explain that one if it's produced in</p> <p>7 one but not the other?</p> <p>8 A I don't know.</p> <p>9 Q All right. Then in Number 780, Item 13 is</p> <p>10 checked no again. And then we have a work order for a</p> <p>11 Camera 303852.</p> <p>12 A Right.</p> <p>13 Q But that's not one of the work orders referenced</p> <p>14 in Number 780, is it?</p> <p>15 A I'm not seeing it, no.</p> <p>16 MR. ZIMMERMAN: Do you have anything else?</p> <p>17 MR. HAGMAN: No.</p> <p>18 MR. ZIMMERMAN: That's all I have. Thank you, sir.</p> <p>19 THE WITNESS: All right.</p> <p>20 MS. EKL: Let me just see if I have anything real</p> <p>21 quick, sorry.</p> <p>22 EXAMINATION</p> <p>23 BY MS. EKL:</p> <p>24 Q Maybe because it's getting late, you were asked a</p>	<p>1 couple questions about holding cells, and specifically</p> <p>2 one of them was in relation to holding cell with the</p> <p>3 camera 1.011. And the question was would a person who</p> <p>4 was going into Courtroom 101 or 102 be put into that</p> <p>5 cell, and I believe you answered yes. Is that one of the</p> <p>6 holding cells that a person going to courtroom going to</p> <p>7 Courtroom 101 or 102 could have been put into?</p> <p>8 A Yes.</p> <p>9 Q And would a person going to Courtroom 101 or 102</p> <p>10 always go into holding cell with the camera marked 1.011?</p> <p>11 A No.</p> <p>12 Q In relation to all of the holding cells that</p> <p>13 you've testified to today, are there any holding cells</p> <p>14 that always correspond under every circumstance to a</p> <p>15 particular courtroom?</p> <p>16 A No.</p> <p>17 Q So there are instances when a person who's going</p> <p>18 to, for instance, Courtroom 101, could be placed in a</p> <p>19 number of other holding cells, correct?</p> <p>20 A Yes.</p> <p>21 Q What are some of the reasons why someone would be</p> <p>22 placed in a different holding cell?</p> <p>23 A There may be too many in one holding cell in one</p> <p>24 area. There may be keep separate order where we cannot</p>
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<p>1 put them in the same area. One could be a witness</p> <p>2 against another. I mean, there could be a variety of</p> <p>3 reasons.</p> <p>4 Q Okay. So is it fair to say that ideally there</p> <p>5 are certain holding cells that would correspond to a</p> <p>6 courtroom, but on a day-to-day basis that could change?</p> <p>7 A Yes.</p> <p>8 Q You testified earlier that your court facility</p> <p>9 has some old monitors in it, correct?</p> <p>10 A Yes.</p> <p>11 Q And correct me if I'm wrong, did you say that the</p> <p>12 videos have been updated, but the monitors have stayed</p> <p>13 old?</p> <p>14 A Yes.</p> <p>15 Q You have observed the photographs that were</p> <p>16 taken, the still shots that were taken from your</p> <p>17 courthouse, correct?</p> <p>18 A Correct.</p> <p>19 Q When you're observing one of those cells through</p> <p>20 the old monitors, do they look as clear as in the same</p> <p>21 fashion that they do in the same fashion that you viewed</p> <p>22 today?</p> <p>23 A [Know/No.] It's like watching an old five inch</p> <p>24 black and white TV.</p>	<p>1 Q Okay. In reference to the control room, I know</p> <p>2 you gave some testimony about this, but I just want to</p> <p>3 make we have got it call. What is the control room used</p> <p>4 for?</p> <p>5 A Doing paperwork, making sure all of the mitts</p> <p>6 that need to go up to the courtrooms go up to the</p> <p>7 courtrooms, all the writs. It's mainly for keeping track</p> <p>8 of everything so that we can get them into the building,</p> <p>9 up to court, and out of the building with DOC as fast as</p> <p>10 possible.</p> <p>11 Q And you mentioned that there were some video</p> <p>12 monitors that were in that control room?</p> <p>13 A Yes.</p> <p>14 Q Do you have any individuals whose job is</p> <p>15 dedicated to viewing those monitors at all times?</p> <p>16 A No.</p> <p>17 Q What are are some of the circumstances under</p> <p>18 which they would be, as part of their job, looking at the</p> <p>19 the video monitors?</p> <p>20 A If we had somebody that was behavioral problem or</p> <p>21 possibly mental health problem where we have to keep</p> <p>22 checking on them constantly, we might have them up on the</p> <p>23 video and that would be monitored more often.</p> <p>24 Q Do you also use those monitors to observe people</p>

1 coming and going from the facilities through the entrance
2 and exits?

3 A Yes.

4 MS. EKL: That's all I have. Thank you.

5 MR. ZIMMERMAN: You're free to leave.

6 THE WITNESS: Thank you.

7 (Ending time: 6:52 p.m.)

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1 REPORTER'S CERTIFICATE

2 The within and foregoing statement of the
3 witness, DONALD MILAZZO, taken before DEANNA L. TUFANO,
4 CSR, and Notary Public, at 77 West Washington, Suite
5 1220, in the City of Chicago, Cook County, Illinois, at
6 5:04 o'clock p.m. on the 13th of March, A.D., 2019.

7 The said witness was first duly sworn and was
8 then examined upon oral interrogatories; and the
9 questions and answers were taken down in shorthand by the
10 undersigned, acting as stenographer and Notary Public;
11 and the within and foregoing is a true, correct, and
12 accurate record of all of the questions asked of and
13 answers made by the said witness, DONALD MILAZZO, the
14 time and place hereinabove referred to.

15 The undersigned is not interested in the within
16 case, nor of kin or counsel to any of the parties.

17 Witness my official signature and seal as Notary
18 Public in and for Cook County, Illinois on this
19 31st Day of March, A.D., 2019.

20 
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22 CSR No. 084-003819
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